

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Case No. 3:07-MD-1827 SI
MDL No. 1827

This Document Relates to:

All Indirect-Purchaser Actions;

State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;

State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and

State of New York v. AU Optronics Corporation, et al., Case No. 11-cv-0711.

DECLARATION OF ROBIN M.
NIEMIEC OF RUST CONSULTING,
INC., NOTICE ADMINISTRATOR

ROBIN M. NIEMIEC, declares and states that:

1. I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify hereto.

2. I am a Client Services Director for Rust Consulting, Inc. ("Rust"). Rust was retained as Notice Administrator to assist in providing notice to potential class members in this Action.

3. I submit this declaration to provide the Court with information regarding the administration of the notice program directed by ¶ 11 of the Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, dated January 26, 2012 (the "Preliminary Approval Order").

1
2 4. Rust established a dedicated website, www.LCDclass.com, to implement the
3 approved notice program. The website contains basic information about the litigation and the
4 proposed settlements, contact information for Rust and links to important documents. The
5 website went live on February 13, 2012. A screen shot of the website homepage on that date
6 is attached as Exhibit A.

7
8 5. The website includes links that permit any potential Class Member (as used
9 herein, "Class Member" includes *parens patriae* group members) to view, download and/or
10 print a copy of any of the following documents:

- 11 • Notice (A copy of the Notice is attached as Exhibit B);
- 12 • Summary Notice (A copy of the Summary Notice is attached as Exhibit C);
- 13 • [Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended
14 Complaint – Demand for Jury Trial;
- 15 • [California] First Amended Complaint for Damages and Injunctive Relief
16 Based on: (1) Violations of the Cartwright Act (Bus. & Prof. Code §§ 16720, et
17 seq.) (2) Violations of the Unfair Competition Act (Bus. & Prof. Code §§
18 17200, et seq.) (3) Unjust Enrichment – Demand for Jury Trial;
- 19 • [California] Complaint For Damages and Injunctive Relief Based on: (1)
20 Violations of the Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2)
21 Violations of the Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.)
22 (3) Unjust Enrichment filed against Chungwha Picture Tubes, Ltd.;
- 23 • [Florida] Amended Complaint for Damages, Civil Penalties, Injunctive Relief –
24 Demand for Jury Trial;
- 25
26
27
28

- [Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint for Damages, Restitution, Civil Penalties, Injunction And Other Relief – Jury Trial Demanded;
- [New York] Second Amended Complaint – Demand for Jury Trial
- Chimei Settlement Agreement
- Chunghwa Settlement Agreement
- Epson Settlement Agreement
- HannStar Settlement Agreement
- Hitachi Settlement Agreement
- Samsung Settlement Agreement
- Sharp Settlement Agreement
- Order Granting Indirect Purchaser Plaintiffs Motion for Class Certification; Denying Defendants’ Motion to Strike Modified Class Definitions; Granting Motions to Strike Untimely Declarations;
- Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs’ Motion to Amend Class Certification Order;
- Order Granting Defendants’ Motion To Alter Or Amend The Indirect Purchaser Classes;
- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Order Approving Revised Forms Of Notice An Resetting Date For Fairness Hearing; and,

- Order Approving Manner And Form of *Parens Patriae* Notice by Publication.

A screen shot of the website Court Documents link as of February 13, 2012 is attached as Exhibit D.

6. On February 20, 2012, a Spanish language version of the Notice was added to the website, and on February 21, 2012, the homepage text was amended, in Spanish, advising of same. Screen shots of the website reflecting Spanish language revisions as of February 21, 2012, are attached as Exhibit E.

7. On March 15, 2012, the following documents relating to Plaintiffs Motion for Interim Reimbursement of Expenses were posted:

- Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Notice of Motion and Motion for Interim Reimbursement of Expenses;
- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Notice of Motion and Motion for Interim Reimbursement of Expenses;
- Declaration of Anne E. Schneider in Support of States Attorneys General's Motion for Interim Reimbursement of Certain Expenses; and,
- Proposed Order Granting Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Notice of Motion and Motion for Interim Reimbursement of Expenses.

Screen shot of the website Court Documents link as of March 15, 2012 is attached as Exhibit F.

1
2 8. On March 26, 2012, the "Important Dates" section of the homepage was
3 updated to include the filing of Plaintiffs Motion for Interim Reimbursement of Expenses. A
4 screen shot of the website homepage as of March 26, 2012 is attached as Exhibit G.

5 9. On April 11, 2012, the "Important Dates" section of the homepage was updated
6 to include a change in trial date and the addition of the date when jury selection would begin
7 for the statewide damages and nationwide injunctive class trials. A screen shot of the website
8 homepage as of April 11, 2012 is attached as Exhibit H.

10 10. Through the website, potential Class Members were given the opportunity to
11 register online to receive updates on future developments in the litigation, including the filing
12 of claim forms.

14 11. To date, the website has been viewed over 450,533 times and 29,791 potential
15 Class Members have registered online to receive email updates. Please note that one
16 individual may have visited the site multiple times.

18 12. On March 21, 2012, Rust electronically sent an email notice to all persons that
19 had registered online as of March 20, 2012 (26,298) regarding the filing of Class Counsel and
20 States Attorneys General's Motion for Interim Reimbursement of Expenses. A copy of the
21 email notice is attached as Exhibit I.

23 13. Beginning on February 13, 2012, Rust has maintained a toll-free telephone
24 number to provide pre-recorded information to callers and to facilitate responses to
25 informational requests from callers. The toll-free number also gives each caller the option to
26 speak directly with a live operator. To date, Rust has received 7,784 calls, within which 3,121
27
28

1 callers requested to speak with a live operator for assistance. Live operators have spoken to
2 each of the 3,121 callers who requested assistance.
3

4 14. As the Court is aware, Kinsella Media, LLC ("KM"), a legal notification firm
5 specializing in the design and implementation of class action notification programs, was
6 retained to develop the plan to provide notice to potential Class Members.
7

8 15. KM developed a Notice Plan which included, in addition to the website,
9 publication of the Short-Form Notice in selected publications throughout the country, and
10 internet and cable television advertisements. The Affidavit of Katherine Kinsella certifying
11 that the notice program was effectuated in accordance with ¶ 11 of the Preliminary Approval
12 Order is being filed contemporaneously herewith.
13

14 16. Pursuant to ¶ 12 of the Preliminary Approval Order, a Request for Exclusion
15 must be postmarked no later than the deadline of April 13, 2012. As of May 3, 2012, Rust has
16 received 11 timely Requests for Exclusion. Annexed hereto as Exhibit J is a complete listing
17 of the name, city, state and Rust's internal tracking number of the 11 Requests for Exclusion
18 received to date. No late exclusions have been received as of the date of this Declaration.
19

20 17. Objections to the settlement must be postmarked no later than April 13, 2012.
21 As of May 3, 2012, Rust has received 15 objections. Annexed hereto as Exhibit K is a
22 complete listing of the name, city, state and Rust's internal tracking number of the 15
23 objections received by Rust to date. No late objections have been received as of the date of
24 this Declaration.
25
26
27
28

1
2 18. I declare under penalty of perjury that the foregoing is true and correct to the
3 best of my knowledge.

4 Executed this 4th day of May, 2012 in Palm Beach Gardens, Florida.

5
6 

7
8 Robin M. Niemiec
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 02/13/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

DOWNLOAD ACROBAT READER

Adobe Reader is free and is required to view and print documents on this site.

[A](#) [A](#) [A](#)

Welcome

If You Bought a TV, Monitor, or Notebook Computer

that Contained a TFT-LCD Flat Panel Screen

Lawsuits And Settlements Totaling Over \$538 Million May Affect You

This website provides information about litigation and settlements involving the price of thin-film transistor liquid display panels ("TFT-LCD") incorporated in televisions, monitors and notebook computers that were purchased INDIRECTLY from the Defendants. "INDIRECTLY" means that you purchased a TFT-LCD panel in a television, monitor or notebook computer from someone other than the manufacturer of that panel. For example, if you purchased a Samsung TFT-LCD television from Best Buy during the Class Period, you made an INDIRECT purchase of the TFT-LCD panel from Defendant Samsung. If you purchased televisions, monitors and notebook computers with TFT-LCD panels INDIRECTLY from the Defendants, this website will provide you with information as it is available. Please click the links on the left to obtain more information. If you want to be directly advised of future developments, including when claim forms will be available, please click [here](#) to register.

There are also settlements and ongoing litigation involving TFT-LCDs purchased DIRECTLY from manufacturers of TFT-LCD panels and products. If you purchased DIRECTLY from the manufacturers, please visit the LCD Direct Purchaser Class website for more information at www.tftlcdclassaction.com.

PLEASE SCROLL DOWN TO VIEW ALL INFORMATION ON THIS PAGE.

The Court granted preliminary approval of settlements totaling over \$538 million on January 26, 2012. Please click [here](#) to see a list of Defendants and Settlement Amounts. Those included in these actions have legal rights and options. Please click [here](#) to obtain more information on these legal rights and options.

IMPORTANT COURT DATES & DEADLINES

| | |
|--|------------------|
| Submit Exclusion Request: | April 13, 2012 |
| Submit Objections: | April 13, 2012 |
| Submit Notice of Intent (to Appear at Fairness Hearing): | April 13, 2012 |
| Fairness Hearing: | May 18, 2012 |
| State and Nationwide Trial: | April 23, 2012 |
| Trial for Attorneys General Actions for AR, FL, MO, MI, WV & WI: | November 5, 2012 |
| Trial for Attorneys General Actions for CA & NY: | Not Scheduled |

At this Fairness Hearing the Court will consider whether each of the Settlements is fair, reasonable and adequate, including any objections or comments that may be filed. After the hearing the Court will decide whether to approve each of the Settlements. We do not know how long these decisions will take.

No money is available for distribution right now. Click [here](#) to register to receive information on future developments including a claim form when one becomes available.

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT B

U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If You Bought a TV, Monitor, or Notebook Computer that Contained a Flat Panel Screen, Lawsuits And Settlements May Affect You.

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- Please read this notice carefully. Your legal rights are affected whether you act or don't act.
- There are lawsuits involving the price of thin film transistor liquid crystal display ("TFT-LCD") Flat Panels purchased indirectly from the Defendants. "Indirectly" means that you purchased the TFT-LCD Flat Panel from someone other than the manufacturer of the Flat Panel.
- The lawsuits were brought as class actions on behalf of consumers, including businesses that bought a TV, monitor, or notebook computer containing a TFT-LCD Flat Panel indirectly from the Defendants, for their own use and not for resale, anytime from 1999 to 2006 (for the Statewide Classes to recover money), or anytime from 1999 to the present (for the Nationwide Class to stop Defendants' conduct that is the subject of the lawsuits). Eight states have brought cases to recover money for their citizens and governmental entities, and for civil penalties. Defendants deny all of the claims in the lawsuits. See Question 6 below for more details.
- Settlements have been reached with seven defendants (together called the "Settling Defendants") and the lawsuits are continuing against the remaining three defendants (together called the "Non-Settling Defendants").
- The Settlements (totaling over \$538 million) will pay consumers in the District of Columbia and the following states: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, North Dakota, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia and Wisconsin. The Settlements will also pay governmental entities in eight states.
- Settling Defendants have agreed not to engage in the conduct that is the subject of the lawsuits and will cooperate with the litigation against the Non-Settling Defendants. The ongoing litigation is seeking money and an order prohibiting the Non-Settling Defendants' alleged behavior that is the subject of the lawsuits.

| YOUR LEGAL RIGHTS AND OPTIONS IN THESE LAWSUITS AND SETTLEMENTS | |
|---|--|
| EXCLUDE YOURSELF | You will <u>not</u> be included in the ongoing lawsuits or Settlements. You will receive no benefits, but you will retain any rights you currently have to sue the Defendants about the claims in this case. |
| DO NOTHING | You will be included in the litigation and be eligible to file a claim for a payment (if you qualify) at a later date. You will give up your rights to sue the Defendants about the claims in this case. |
| OBJECT TO SETTLEMENTS | If you do not exclude yourself you can write to the Court explaining why you disagree with the Settlements. |
| GO TO THE HEARING | Ask to speak in Court about your opinion of the Settlements. |

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

CALL TOLL FREE 1-855-225-1886 OR VISIT WWW.LCDCLASS.COM
PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR O VISITAR NUESTRO WEBSITE

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION..... Page 3

1. What is this Notice about?
2. What are the lawsuits about?
3. What is a TFT-LCD Flat Panel?
4. What is a class action?

WHO IS INCLUDED..... Page 3

5. Who are Defendant companies?
6. How do I know if I am in the Classes?
7. Are the Attorneys General involved?
8. Why are there Settlements but the lawsuits are continuing?

THE SETTLEMENTS' BENEFITS Page 5

9. What do the Settlements provide?
10. How much money can I get?
11. When will I get a payment?
12. What is the injunctive relief?

REMAINING IN THE CLASSES OR ATTORNEYS GENERAL ACTIONS Page 6

13. What am I giving up if I stay in the lawsuits?

EXCLUDING YOURSELF FROM THE CLASSES OR ATTORNEYS GENERAL ACTIONS Page 7

14. How do I get out of the Classes or Attorneys General Actions?
15. If I don't exclude myself, can I sue for the same thing later?
16. If I exclude myself, can I still get benefits?

OBJECTING OR COMMENTING ON THE SETTLEMENTS Page 7

17. How do I object or comment on the Settlements?
18. What is the difference between excluding myself (from the Classes or Attorneys General Actions) or objecting to the Settlements?

THE LAWYERS REPRESENTING YOU Page 8

19. Do I have a lawyer representing me?
20. How will the lawyers be paid?

THE FAIRNESS HEARING Page 8

21. When and where will the Court decide whether to approve the Settlements?
22. Do I have to come to the hearing?
23. May I speak at the hearing?

THE TRIALS Page 9

24. When and where will the trials against the Non-Settling Defendants take place?
25. What are the Plaintiffs asking for from the Non-Settling Defendants?
26. Will I get money after the trials?

GET MORE INFORMATION..... Page 10

27. Where can I get more information?

BASIC INFORMATION

1. What is this Notice about?

This Notice is to inform you about the status and partial settlement of ongoing litigation which may affect your rights. You have the right to know about the lawsuits and about your legal rights and options before the Court or a jury decides whether the claims being made against the Defendants on your behalf are correct, and whether to approve the Settlements.

The Court in charge is the United States District Court for the Northern District of California. The case is called *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827. The people who sued are called the Plaintiffs, and the companies they sued are called the Defendants (*see* Question 5).

2. What are the lawsuits about?

The lawsuits claim that the Defendants conspired to fix, raise, maintain or stabilize prices of TFT-LCD Flat Panels resulting in overcharges to consumers who bought products containing the TFT-LCD Flat Panels. The Defendants deny Plaintiffs' allegations or that indirect purchasers suffered any overcharge. The Court has not yet decided who is right.

3. What is a TFT-LCD Flat Panel?

TFT-LCD Flat Panels (thin-film transistor liquid display panels) are the glass display panels used in many flat screen televisions, monitors and notebook computers. Monitors have various uses, including as desktop computers and TVs. Only purchasers of TVs, monitors and notebook computers containing TFT-LCD Flat Panels are included in the Classes.

4. What is a class action?

In a class action, people called class representatives sue on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all class members except those who exclude themselves from the Class.

WHO IS INCLUDED

5. Who are the Defendant companies?

The Defendants are manufacturers and/or suppliers of TFT-LCD Flat Panels.

The Settling Defendant companies are:

- Chimei Innolux Corp.; Chi Mei Corp.; Chi Mei Optoelectronics Corp.; Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd. ("Chimei");
- Chunghwa Picture Tubes Ltd. ("Chunghwa");
- Epson Imaging Devices Corp. ("Epson");
- HannStar Display Corp. ("HannStar");
- Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA), Inc. ("Hitachi");

- Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics America, Inc. (“Samsung”); and
- Sharp Corp.; Sharp Electronics Corp. (“Sharp”).

The Non-Settling Defendant companies are:

- AU Optronics Corp.; AU Optronics Corp. America, Inc. (“AU Optronics”);
- LG Display Co., Ltd.; LG Display America, Inc. (“LG”);
- Toshiba Corp.; Toshiba Mobile Display Co., Ltd.; Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc. (“Toshiba”); and
- Non-Settling Defendants’ U.S. affiliates.

6. How do I know if I am in the Classes?

These cases are proceeding as class actions for monetary recovery (“damages”) for consumers in 24 states and the District of Columbia, and for nationwide injunctive relief to stop the Defendants’ alleged illegal behavior and make sure that it doesn’t happen in the future (*see* Question 12).

Statewide Damages Classes: The Statewide Classes are being brought to recover money, and generally include any person or business that indirectly purchased TFT-LCD panels incorporated in TVs, monitors and/or notebook computers from one or more of the Defendants (listed in the response to Question 5) or Quanta Display Inc., from 1999 to 2006, for their own use and not for resale, while residing in the 24 states or DC. The purchase must have been made in the same state where the person or business resided.

The 24 states are: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, North Dakota, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia and Wisconsin.

The Court has created two exceptions to this definition, but only for the ongoing litigation against the Non-Settling Defendants. You are not a member of the Statewide Damages Classes against the Non-Settling Defendants if: (1) you purchased a product containing a LCD panel in the United States between January 1, 1996 and December 11, 2006 directly from any of the Defendants and did not exclude yourself from the Direct Purchaser Class (*see* www.tftlcdclassaction.com for more information); or (2) you purchased a TV, monitor and/or notebook computer in Missouri or Rhode Island, while residing there, and your purchase was not primarily for your own personal, family or household use.

Nationwide Class: The Nationwide Class is being brought to stop Defendants’ alleged illegal behavior and includes any person or business that indirectly purchased in the U.S., TFT-LCD panels incorporated in televisions, monitors and/or notebook computers, from one or more of the Defendants (listed in the response to Question 5) or Quanta Display Inc., between 1999 and the present, for their own use and not for resale, and reside in the U.S. as of the date of this notice.

The specific class definitions are available at www.LCDclass.com.

7. Are the Attorneys General involved?

The Attorneys General of Arkansas, California, Florida, Michigan, Missouri, New York, West Virginia and Wisconsin are participating in these Settlements and have asserted claims: (1) on behalf of state residents under the doctrine of *parens patriae*, which allows a state to bring a lawsuit on behalf of its citizens, and/or governmental entities; and (2) for civil penalties. The claims brought by the Attorneys General arise from the same alleged conduct by the Defendants as asserted in the class actions. The

Attorneys General's lawsuits, other than California, are pending in federal court. The California Attorney General filed in California state court.

8. Why are there Settlements but the lawsuits are continuing?

Settlements have been reached with Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp. Non-Settling Defendants (AU Optronics, LG, Toshiba and their U.S. affiliates) have **not** agreed to settle so the lawsuits continue against them.

Additional money may become available as a result of a trial or future settlements. Alternatively, the litigation may be resolved in favor of the Non-Settling Defendants, in which case no additional money would become available. There is no guarantee as to what will happen.

THE SETTLEMENTS' BENEFITS

9. What do the Settlements provide?

There are seven Settlements, totaling \$538,555,647, being presented to the Court for approval. The Settlement Fund will be used to pay individual and business consumers in the 24 states and DC. A portion of the Settlement Fund will be distributed to governmental entity consumers in the eight states with the Attorneys General Actions. In addition to the Settlement Fund, Chimei, Epson, HannStar, Hitachi and Sharp are making payments to resolve claims for civil penalties brought by the Attorneys General. More details about the anticipated distribution of the Settlement Fund are available in the Settlement Agreements and other documents available at www.LCDclass.com.

Chimei Settlement: Chimei will pay \$110,273,318 into the Settlement Fund.

Chunghwa Settlement: Chunghwa will pay \$5,305,105 into the Settlement Fund.

Epson Settlement: Epson will pay \$2,850,000 into the Settlement Fund.

HannStar Settlement: HannStar will pay \$25,650,000 into the Settlement Fund.

Hitachi Settlement: Hitachi will pay \$38,977,224 into the Settlement Fund.

Samsung Settlement: Samsung will pay \$240,000,000 into the Settlement Fund.

Sharp Settlement: Sharp will pay \$115,500,000 into the Settlement Fund.

Any interest earned will be added to the Settlement Fund. The cost to administer the Settlements as well as attorneys' fees and payments to the Class Representatives will come out of the Settlement Fund (*see* Question 20). The attorneys also may ask the Court to permit the use of money from the Settlement Fund to help finance the ongoing litigation, in accordance with the provisions of the Settlements.

10. How much money can I get?

At this time, it is unknown how much each Class Member who submits a valid claim will receive. Payments will be determined on a *pro rata* basis. This means it will be based on the number of valid

claims filed as well as on the number/type of Flat Panel product(s) you purchased. It is anticipated that a minimum payment will be made to all Class Members who submit a valid claim. It's possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court.

In order to receive a payment you will need to file a valid claim form when the claims period begins. A notice about the claims process will be made available after the conclusion of the lawsuits or as ordered by the Court.

If you want to receive a notice about the claims process or future settlements you should register at www.LCDclass.com or by calling 1-855-225-1886.

11. When will I get a payment?

No money will be distributed yet. The lawyers for the Plaintiffs will pursue the lawsuits against the Non-Settling Defendants and expect to complete the litigation before any claims are paid. The lawyers for the Plaintiffs believe that money will be paid by the Non-Settling Defendants through additional settlements or as a result of winning the lawsuits. All funds received in this case will be distributed together at the conclusion of the lawsuits or as ordered by the Court.

12. What is the injunctive relief?

Chimei, Chunghwa, HannStar, Hitachi, Samsung, and Sharp have agreed not to engage in certain conduct that would violate the antitrust laws that are at issue in these lawsuits. They also agree to establish (or maintain) a program to educate their employees about complying with the law, and report on their compliance with this requirement for a period of five years. Additionally, the Settling Defendants will cooperate with the Plaintiffs in their ongoing litigation against the Non-Settling Defendants. Epson is not a participant in the injunctive relief because it no longer sells TFT-LCD Flat Panels.

REMAINING IN THE CLASSES OR ATTORNEYS GENERAL ACTIONS

13. What am I giving up if I stay in the lawsuits?

You will give up your right to sue the Defendants on your own for the claims in this case unless you exclude yourself from the Classes or the Attorneys General Actions. You also will be bound by any decisions by the Court relating to the lawsuits and Settlements. If you reside outside of the 24 states or the District of Columbia you will retain any right you may have to sue the Defendants for monetary relief.

In return for paying the Settlement amounts, the Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from all claims relating to the facts underlying these lawsuits, as more fully described in the Settlement Agreements. The Settlement Agreements describe the released claims in detail, so read them carefully since those descriptions are binding on you. If you have any questions, you can talk to Class Counsel or the Attorneys General listed in Question 19 for free, or you can, of course, talk to your own lawyer if you have questions about what this means. The Settlement Agreements and the specific releases are available at www.LCDclass.com.

EXCLUDING YOURSELF FROM THE CLASSES OR ATTORNEYS GENERAL ACTIONS

14. How do I get out of the Classes and Attorneys General Actions?

To exclude yourself from the Classes and Attorneys General actions (including any *parens patriae* claims), you must send a request for exclusion by mail stating that you want to be excluded from *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827. Your request for exclusion must also include your name, your address, your telephone number and your signature. You must mail your exclusion request no later than **April 13, 2012**, to:

LCD Indirect Exclusions
P.O. Box 8025
Faribault, MN 55021-9425

15. If I don't exclude myself, can I sue for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants for the claims in this case.

16. If I exclude myself, can I still get benefits?

No. If you exclude yourself, you will not get any benefit as a result of the Settlements, trial or judgment in this case.

OBJECTING OR COMMENTING ON THE SETTLEMENTS

17. How do I object or comment on the Settlements?

If you have comments about, or disagree with, any aspect of the Settlements, including the maximum attorneys' fees which may be requested, use of settlement funds to pay administration and litigation costs and expenses, payments to Class Representatives, or to finance the ongoing litigation, you may express your views to the Court by writing to the address below. The written response needs to include your name, address, telephone number, the case name and number (*In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827), a brief explanation of your reasons for objecting and your signature. The response must be postmarked no later than **April 13, 2012** and mailed to:

| COURT | NOTICE ADMINISTRATOR |
|--|--|
| Clerk's Office United States District Court for the District of Northern California 16 th Floor 450 Golden Gate Avenue San Francisco, CA 94102 | LCD Indirect Objections P.O. Box 8025 Faribault, MN 55021-9425 |

18. What's the difference between excluding myself (from the Classes or Attorneys General Actions) or objecting to the Settlements?

If you exclude yourself from the Classes and Attorneys General Actions you are telling the Court that you don't want to be part of these cases and, therefore, you will not receive any benefits from them. Objecting simply means telling the Court that you don't like something about the Settlements. You can object only if you remain in the Classes and/or Attorneys General Actions. If you exclude yourself, you have no basis to object to the Settlements because the case no longer affects you.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer representing me?

The Court has appointed Zelle Hofmann Voelbel & Mason LLP and the Alioto Law Firm to represent you as "Co-Lead Class Counsel" for the Classes. As noted above, Attorneys General of eight states are also representing consumers as *parens patriae* and/or governmental entities in their states. You do not have to pay Class Counsel or the Attorneys General separately. The attorneys will be paid by asking the Court for a share of the Settlement proceeds or recovery obtained. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

20. How will the lawyers be paid?

At a later date, Class Counsel and the Attorneys General will ask the Court for attorneys' fees based on their work on this litigation, not to exceed one-third of the \$538,555,647 Settlement Fund, plus reimbursement of their costs and expenses. Class Counsel will also request a payment to the Class Representatives who helped the lawyers on behalf of the Classes. Class Counsel and the Attorneys General may seek additional attorneys' fees from any other settlement or recovery obtained. Any payment to the attorneys will be subject to Court approval and the Court may award less than the requested amount. The fees, costs, expenses and awards that the Court orders, plus the costs to administer the Settlement, will come out of the Settlement Fund.

When the attorneys' motion for fees, costs and expenses, and Class Representative payments is filed it will be available at www.LCDclass.com. The motion will be posted on the website at least 45 days before the Court holds a hearing to consider the request, and you will have an opportunity to comment. Register at the website or by calling 1-855-225-1886 to receive notice when the motion is filed.

THE FAIRNESS HEARING

21. When and where will the Court decide whether to approve the Settlements?

The Court will hold a Fairness Hearing at **9:00 a.m. on May 18, 2012**, at the United States District Court for the Northern District of California, Courtroom 10, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.LCDclass.com. At this hearing the Court will consider whether each of the Settlements is fair, reasonable and adequate. If there are objections or comments, the Court will consider them at this time. After the hearing, the Court will decide whether to approve each of the Settlements. We do not know how long these decisions will take.

22. Do I have to come to the hearing?

No. Class Counsel and the Attorneys General will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear in *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827." Be sure to include your name, address, telephone number and your signature. Your Notice of Intent to Appear must be postmarked no later than **April 13, 2012**, and must be sent to the addresses listed in Question 17. You cannot speak at the hearing if you exclude yourself from the Classes.

THE TRIALS**24. When and where will the trials against the Non-Settling Defendants take place?**

If the cases are not dismissed or settled, the Plaintiffs will have to prove their claims against the Non-Settling Defendants. The first trial, on behalf of the Class Members (excluding residents of Arkansas), is set to begin on April 23, 2012 at the United States District Court for the Northern District of California, Courtroom 10, 19th Floor 450 Golden Gate Avenue, San Francisco, CA 94102. A second trial, involving the *parens patriae* and governmental claims of the Attorneys General of Arkansas, Florida, Missouri, Michigan, West Virginia and Wisconsin, is set to begin on November 5, 2012. Additional trials involving the *parens patriae* and government claims of the Attorneys General of California and New York have not been set yet.

During the trials, a decision will be reached about whether the Plaintiffs or the Non-Settling Defendants are right about the claims in the lawsuits. There is no guarantee that the Plaintiffs will win any money or benefits for consumers.

25. What are the Plaintiffs asking for from the Non-Settling Defendants?

Class Counsel are asking for money for Class Members in the 23 states and the District of Columbia (*i.e.* consumers in the states listed in Question 6, excluding residents of Arkansas). The Attorneys General are also asking for money for consumers and governmental entities in their states and for civil penalties. Both Class Counsel and the Attorneys General are seeking an order to prohibit the Non-Settling Defendants' alleged behavior that is the subject of the lawsuits.

26. Will I get money after the trials?

If the Plaintiffs obtain money or benefits as a result of a trial or settlement, you will be notified about how to ask for a share or what your other options are at that time. These things are not known right now. Important information about the case will be posted on the website, www.LCDclass.com, as it becomes available.

GET MORE INFORMATION

27. Where can I get more information?

The Notice summarizes the lawsuits and the Settlements. You can get more information about the lawsuits and Settlements at www.LCDclass.com, by calling 1-855-225-1886, or writing to LCD Class, P.O. Box 8025, Faribault, MN 55021-9425.

EXHIBIT C

If You Bought a TV, Monitor, or Notebook Computer That Contained a Flat Panel Screen Lawsuits and Settlements Could Affect You.

There are lawsuits involving the price of thin film transistor liquid crystal display ("TFT-LCD") Flat Panels purchased indirectly from the Defendants. "Indirectly" means that you purchased the TFT-LCD Flat Panel from someone other than the manufacturer of the Flat Panel.

Settlements have been reached with seven Defendants (Chimei Innolux Corp.; Chunghwa Picture Tubes Ltd.; Epson Imaging Devices Corp.; HannStar Display Corp.; Hitachi Displays, Ltd.; Samsung Electronics Co., Ltd.; and Sharp Corp.). Three Defendants (AU Optonics Corp.; LG Display Co. Ltd.; Toshiba Corp.; and their U.S. affiliates) have not agreed to settle so the lawsuits continue against them.

What are the lawsuits about?

The lawsuits claim that the Defendants conspired to fix, raise, maintain or stabilize prices of TFT-LCD Flat Panels resulting in overcharges to consumers who bought products containing the panels. The litigation is asking for money and an order to stop the Defendants' alleged behavior that is the subject of these lawsuits. The Defendants deny Plaintiffs' allegations or that indirect purchasers suffered any overcharge. The Court has not decided who is right.

Who is included in the lawsuits?

The case is proceeding to recover money for consumers in 24 states and the District of Columbia and governmental entities in eight states, and for nationwide injunctive relief to stop the Defendants' alleged behavior.

Statewide Damages Classes: Generally, include any person or business that indirectly purchased TFT-LCD panels incorporated in TVs, monitors and/or notebook computers from one or more of the Defendants or Quanta Display Inc., from 1999 to 2006, for their own use and not for resale, while residing in the 24 states or DC. The purchase must have been made in the same state where the person or business resided. The specific class definitions, including exceptions to Class membership, are available at www.LCDclass.com.

The 24 states are: AZ, AR, CA, FL, HI, IA, KS, ME, MA, MI, MN, MS, MO, NV, NM, NY, NC, ND, RI, SD, TN, VT, WV and WI.

Nationwide Class: Includes any person or business that indirectly purchased in the U.S., TFT-LCD panels incorporated in TVs, monitors and/or notebook computers, from one or more of the Defendants or Quanta Display Inc., between 1999 and the present, for their own use and not for resale, and reside in the U.S. as of the date of this notice.

Attorneys General Actions: The Attorneys General of AR, CA, FL, MI, MO, NY, WV and WI are participating in these Settlements to resolve related claims arising from the same allegations as asserted in the class actions: (1) on behalf of state residents under the doctrine of *parens patriae*, which allows a state to bring a lawsuit on behalf of its citizens, and/or for governmental entities; and (2) for civil penalties.

What do the Settlements provide?

There are seven Settlements, totaling \$538,555,647, being presented to the Court for approval. Any interest earned will be added to the Settlement Fund. The Settlement Fund will be used to pay individual and business consumers in the 24 states and DC, and governmental entity consumers in the eight states. Some Settling Defendants also are paying civil penalties to the Attorneys General. More details are in Settlement Agreements and other documents available at www.LCDclass.com. The cost to administer the Settlements, as well as attorneys' fees, costs and expenses, and payments to the Class Representatives, will come out of the Settlement Fund. In the future, Plaintiffs' counsel will request attorneys' fees not to exceed one-third of the Settlement Fund, plus reimbursement of costs and expenses. The attorneys also may ask the Court to permit the use of money from the Settlement Fund to help finance the ongoing litigation.

The Settling Defendants have agreed not to engage in conduct that is at issue in these lawsuits and will establish (or maintain) a program to educate their employees about complying with the law, and will cooperate with the Plaintiffs in their ongoing litigation against the Non-Settling Defendants.

How can I get a payment?

No money will be distributed yet. Plaintiffs' counsel will pursue the lawsuits against the Non-Settling Defendants. All funds received in this case will be distributed together at the conclusion of the lawsuits or as ordered by the Court. You will need to file a valid claim to receive a payment. Notice about the claims process will be made available at a later date. If you want to receive notice about the claims process or future settlements you should register at www.LCDclass.com.

What are my rights?

If you do nothing, your rights will be affected. If you do not want to be legally bound by the lawsuits, you must exclude yourself from the Classes or the Attorneys General Actions. The deadline to exclude yourself is **April 13, 2012**. If you do not exclude yourself you will not be able to sue the Defendants for any claim relating to the lawsuits. If you reside outside of the 24 states or DC you will retain any right you have to sue the Defendants for monetary relief.

The Court will hold a hearing on **May 18, 2012** to consider whether to approve the Settlements. If you stay in the Classes, you may object to the Settlements by **April 13, 2012**. You or your own lawyer may appear and speak at the hearing at your own expense. **Any request for exclusion or objection must be mailed to: LCD Class, P.O. Box 8025, Faribault, MN 55021-9425.**

A class action trial against the Non-Settling Defendants is scheduled to begin on April 23, 2012. A second trial, involving the claims of the Attorneys General of AR, FL, MO, MI, WV and WI, is set to begin on November 5, 2012. Additional trials involving the claims of the Attorneys General of CA and NY may take place at a later date.

For More Information: 1-855-225-1886 www.LCDclass.com

Text: "LCDclass" to 41513 (Text messaging rates may apply)

EXHIBIT D

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 02/13/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

Court Documents

NOTICES

- Notice
- Summary Publication Notice

COMPLAINTS

- [Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended Complaint - Demand For Jury Trial, *April 29, 2011*
- [California] First Amended Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury Trial, *March 2, 2011*
- [California] Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment, filed against Chunghwa Picture Tubes, Ltd. only, August 29, 2011
- [Florida] Amended Complaint For Damages, Civil Penalties, Injunctive Relief – Demand For Jury Trial, *April 13, 2011*
- [Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint For Damages, Restitution, Civil Penalties, Injunctive And Other Relief – Jury Trial Demanded, *April 29, 2011*

- [New York] Second Amended Complaint - Demand For Jury Trial, *February 3, 2012*

SETTLEMENT AGREEMENTS

- Settlement Agreement-Chimei
- Settlement Agreement-Chunghwa
- Settlement Agreement-Epson
- Settlement Agreement-HannStar
- Settlement Agreement-Hitachi
- Settlement Agreement-Samsung
- Settlement Agreement-Sharp

COURT ORDERS

- Order Granting Indirect Purchaser Plaintiffs' Motion For Class Certification; Denying Defendants' Motion To Strike Modified Class Definitions; Granting Motions To Strike Untimely Declarations, *March 28, 2010*
- Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs' Motion To Amend Class Certification Order, *July 28, 2011*
- Order Granting Defendants' Motion To Alter Or Amend The Indirect Purchaser Classes, *January 26, 2012*
- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *January 26, 2012*
- Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing, *February 3, 2012*

- **Order Approving Manner And Form Of *Parens Patriae* Notice By Publication**, *February 6, 2012*

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authroized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT E

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 02/20/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

[A](#) [A](#) [A](#)

Court Documents

NOTICES

- Notice (English version)
- Notice (Spanish version)
- Summary Publication Notice

COMPLAINTS

- [Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended Complaint - Demand For Jury Trial, *April 29, 2011*
- [California] First Amended Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury Trial, *March 2, 2011*
- [California] Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment, filed against Chunghwa Picture Tubes, Ltd. only, August 29, 2011
- [Florida] Amended Complaint For Damages, Civil Penalties, Injunctive Relief – Demand For Jury Trial, *April 13, 2011*

- **[Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint For Damages, Restitution, Civil Penalties, Injunctive And Other Relief – Jury Trial Demanded, April 29, 2011**
- **[New York] Second Amended Complaint - Demand For Jury Trial, February 3, 2012**

SETTLEMENT AGREEMENTS

- **Settlement Agreement-Chimei**
- **Settlement Agreement-Chunghwa**
- **Settlement Agreement-Epson**
- **Settlement Agreement-HannStar**
- **Settlement Agreement-Hitachi**
- **Settlement Agreement-Samsung**
- **Settlement Agreement-Sharp**

COURT ORDERS

- **Order Granting Indirect Purchaser Plaintiffs' Motion For Class Certification; Denying Defendants' Motion To Strike Modified Class Definitions; Granting Motions To Strike Untimely Declarations, March 28, 2010**
- **Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs' Motion To Amend Class Certification Order, July 28, 2011**
- **Order Granting Defendants' Motion To Alter Or Amend The Indirect Purchaser Classes, January 26, 2012**

- **Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements**, *January 26, 2012*
- **Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing**, *February 3, 2012*
- **Order Approving Manner And Form Of *Parens Patriae* Notice By Publication**, *February 6, 2012*

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authroized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 02/20/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

DOWNLOAD ACROBAT READER

Adobe Reader is free and is required to view and print documents on this site.

[A](#) [A](#) [A](#)

Welcome

If You Bought a TV, Monitor, or Notebook Computer

that Contained a TFT-LCD Flat Panel Screen

Lawsuits And Settlements Totaling Over \$538 Million May Affect You

This website provides information about litigation and settlements involving the price of thin-film transistor liquid display panels ("TFT-LCD") incorporated in televisions, monitors and notebook computers that were purchased INDIRECTLY from the Defendants. "INDIRECTLY" means that you purchased a TFT-LCD panel in a television, monitor or notebook computer from someone other than the manufacturer of that panel. For example, if you purchased a Samsung TFT-LCD television from Best Buy during the Class Period, you made an INDIRECT purchase of the TFT-LCD panel from Defendant Samsung. If you purchased televisions, monitors and notebook computers with TFT-LCD panels INDIRECTLY from the Defendants, this website will provide you with information as it is available. Please click the links on the left to obtain more information. If you want to be directly advised of future developments, including when claim forms will be available, please click [here](#) to register.

There are also settlements and ongoing litigation involving TFT-LCDs purchased DIRECTLY from manufacturers of TFT-LCD panels and products. If you purchased DIRECTLY from the manufacturers, please visit the LCD Direct Purchaser Class website for more information at www.tftlcdclassaction.com.

THE DETAILED NOTICE IS NOW AVAILABLE FOR DOWNLOAD IN SPANISH.

EL AVISO DETALLADO ESTÁ DISPONIBLE PARA DESCARGARLO EN ESPAÑOL.

PARA OBTENER UNA COPIA DEL AVISO DETALLADO, POR FAVOR HAGA CLICK [AQUÍ](#).

PLEASE SCROLL DOWN TO VIEW ALL INFORMATION ON THIS PAGE.

The Court granted preliminary approval of settlements totaling over \$538 million on January 26, 2012. Please click **here** to see a list of Defendants and Settlement Amounts. Those included in these actions have legal rights and options. Please click **here** to obtain more information on these legal rights and options.

IMPORTANT COURT DATES & DEADLINES

| | |
|--|------------------|
| Submit Exclusion Request: | April 13, 2012 |
| Submit Objections: | April 13, 2012 |
| Submit Notice of Intent (to Appear at Fairness Hearing): | April 13, 2012 |
| Fairness Hearing: | May 18, 2012 |
| State and Nationwide Trial: | April 23, 2012 |
| Trial for Attorneys General Actions for AR, FL, MO, MI, WV & WI: | November 5, 2012 |
| Trial for Attorneys General Actions for CA & NY: | Not Scheduled |

At this Fairness Hearing the Court will consider whether each of the Settlements is fair, reasonable and adequate, including any objections or comments that may be filed. After the hearing the Court will decide whether to approve each of the Settlements. We do not know how long these decisions will take.

No money is available for distribution right now. Click [here](#) to register to receive information on future developments including a claim form when one becomes available.

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT F

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 03/15/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

[A](#) [A](#) [A](#)

Court Documents

NOTICES

- Notice (English version)
- Notice (Spanish version)
- Summary Publication Notice

MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES

- Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Notice of Motion and Motion for Interim Reimbursement of Expenses, *March 14, 2012*
- Declaration of Jack W. Lee In Support of Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Motion for Interim Reimbursement of Expenses *March 14, 2012*
- Declaration of Anne E. Schneider in Support of States Attorneys General's Motion for Interim Reimbursement of Certain Expenses *March 14, 2012*
- Proposed Order Granting Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Motion for Interim Reimbursement of Expenses *March 14, 2012*

COMPLAINTS

- [Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended Complaint - Demand For Jury Trial, *April 29, 2011*
- [California] First Amended Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair

Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury

Trial, *March 2, 2011*

- **[California] Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment**, filed against Chunghwa Picture Tubes, Ltd. only, August 29, 2011
- **[Florida] Amended Complaint For Damages, Civil Penalties, Injunctive Relief – Demand For Jury Trial, *April 13, 2011***
- **[Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint For Damages, Restitution, Civil Penalties, Injunctive And Other Relief – Jury Trial Demanded, *April 29, 2011***
- **[New York] Second Amended Complaint - Demand For Jury Trial, *February 3, 2012***

SETTLEMENT AGREEMENTS

- **Settlement Agreement-Chimei**
- **Settlement Agreement-Chunghwa**
- **Settlement Agreement-Epson**
- **Settlement Agreement-HannStar**
- **Settlement Agreement-Hitachi**
- **Settlement Agreement-Samsung**
- **Settlement Agreement-Sharp**

COURT ORDERS

- **Order Granting Indirect Purchaser Plaintiffs' Motion For Class Certification; Denying Defendants' Motion To Strike Modified Class Definitions; Granting Motions To Strike Untimely Declarations,** *March 28, 2010*
- **Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs' Motion To Amend Class Certification Order,** *July 28, 2011*
- **Order Granting Defendants' Motion To Alter Or Amend The Indirect Purchaser Classes,** *January 26, 2012*
- **Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements,** *January 26, 2012*
- **Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing,** *February 3, 2012*
- **Order Approving Manner And Form Of *Parens Patriae* Notice By Publication,** *February 6, 2012*

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT G

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 03/26/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

DOWNLOAD ACROBAT READER

Adobe Reader is free and is required to view and print documents on this site.

[A](#) [A](#) [A](#)

Welcome

If You Bought a TV, Monitor, or Notebook Computer

that Contained a TFT-LCD Flat Panel Screen

Lawsuits And Settlements Totaling Over \$538 Million May Affect You

This website provides information about litigation and settlements involving the price of thin-film transistor liquid display panels ("TFT-LCD") incorporated in televisions, monitors and notebook computers that were purchased INDIRECTLY from the Defendants. "INDIRECTLY" means that you purchased a TFT-LCD panel in a television, monitor or notebook computer from someone other than the manufacturer of that panel. For example, if you purchased a Samsung TFT-LCD television from Best Buy during the Class Period, you made an INDIRECT purchase of the TFT-LCD panel from Defendant Samsung. If you purchased televisions, monitors and notebook computers with TFT-LCD panels INDIRECTLY from the Defendants, this website will provide you with information as it is available. Please click the links on the left to obtain more information. If you want to be directly advised of future developments, including when claim forms will be available, please click [here](#) to register.

There are also settlements and ongoing litigation involving TFT-LCDs purchased DIRECTLY from manufacturers of TFT-LCD panels and products. If you purchased DIRECTLY from the manufacturers, please visit the LCD Direct Purchaser Class website for more information at www.tftlcdclassaction.com.

THE DETAILED NOTICE IS NOW AVAILABLE FOR DOWNLOAD IN SPANISH.

EL AVISO DETALLADO ESTÁ DISPONIBLE PARA DESCARGARLO EN ESPAÑOL.

PARA OBTENER UNA COPIA DEL AVISO DETALLADO, POR FAVOR HAGA CLICK [AQUÍ](#).

PLEASE SCROLL DOWN TO VIEW ALL INFORMATION ON THIS PAGE.

The Court granted preliminary approval of settlements totaling over \$538 million on January 26, 2012. Please click **here** to see a list of Defendants and Settlement Amounts. Those included in these actions have legal rights and options. Please click **here** to obtain more information on these legal rights and options.

IMPORTANT COURT DATES & DEADLINES

| | |
|--|------------------|
| Submit Exclusion Request: | April 13, 2012 |
| Submit Objections to Settlements: | April 13, 2012 |
| Submit Objections to Motion for Reimbursement of Expenses: | April 13, 2012 |
| Submit Notice of Intent (to Appear at Fairness Hearing): | April 13, 2012 |
| Fairness Hearing: | May 18, 2012 |
| State and Nationwide Trial: | April 23, 2012 |
| Trial for Attorneys General Actions for AR, FL, MO, MI, WV & WI: | November 5, 2012 |
| Trial for Attorneys General Actions for CA & NY: | Not Scheduled |

At this Fairness Hearing the Court will consider whether each of the Settlements is fair, reasonable and adequate, including any objections or comments that may be filed. After the hearing the Court will decide whether to approve each of the Settlements. We do not know how long these decisions will take. The Court will also consider the Motion for Reimbursement of Expenses at the Fairness Hearing.

No money is available for distribution right now. Click [here](#) to register to receive information on future developments including a claim form when one becomes available.

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT H

LCD Indirect Purchaser

Litigation and

Settlements

CLASS ACTION LAWSUITS

AG PARENS PATRIAE ACTIONS

Last Updated: 04/11/2012

HOME

CLASS DEFINITIONS

DEFENDANTS AND SETTLEMENT

AMOUNTS

COURT DOCUMENTS

REGISTRATION

UPDATE ADDRESS

NOTICES

FAQS

CONTACT INFORMATION

DOWNLOAD ACROBAT READER

Adobe Reader is free and is required to view and print documents on this site.

[A](#) [A](#) [A](#)

Welcome

If You Bought a TV, Monitor, or Notebook Computer

that Contained a TFT-LCD Flat Panel Screen

Lawsuits And Settlements Totaling Over \$538 Million May Affect You

This website provides information about litigation and settlements involving the price of thin-film transistor liquid display panels ("TFT-LCD") incorporated in televisions, monitors and notebook computers that were purchased INDIRECTLY from the Defendants. "INDIRECTLY" means that you purchased a TFT-LCD panel in a television, monitor or notebook computer from someone other than the manufacturer of that panel. For example, if you purchased a Samsung TFT-LCD television from Best Buy during the Class Period, you made an INDIRECT purchase of the TFT-LCD panel from Defendant Samsung. If you purchased televisions, monitors and notebook computers with TFT-LCD panels INDIRECTLY from the Defendants, this website will provide you with information as it is available. Please click the links on the left to obtain more information. If you want to be directly advised of future developments, including when claim forms will be available, please click [here](#) to register.

There are also settlements and ongoing litigation involving TFT-LCDs purchased DIRECTLY from manufacturers of TFT-LCD panels and products. If you purchased DIRECTLY from the manufacturers, please visit the LCD Direct Purchaser Class website for more information at www.tftlcdclassaction.com.

THE DETAILED NOTICE IS NOW AVAILABLE FOR DOWNLOAD IN SPANISH.

EL AVISO DETALLADO ESTÁ DISPONIBLE PARA DESCARGARLO EN ESPAÑOL.

PARA OBTENER UNA COPIA DEL AVISO DETALLADO, POR FAVOR HAGA CLICK [AQUÍ](#).

PLEASE SCROLL DOWN TO VIEW ALL INFORMATION ON THIS PAGE.

The Court granted preliminary approval of settlements totaling over \$538 million on January 26, 2012. Please click **here** to see a list of Defendants and Settlement Amounts. Those included in these actions have legal rights and options. Please click **here** to obtain more information on these legal rights and options.

IMPORTANT COURT DATES & DEADLINES

| | |
|--|------------------|
| Submit Exclusion Request: | April 13, 2012 |
| Submit Objections to Settlements: | April 13, 2012 |
| Submit Objections to Motion for Reimbursement of Expenses: | April 13, 2012 |
| Submit Notice of Intent (to Appear at Fairness Hearing): | April 13, 2012 |
| Fairness Hearing: | May 18, 2012 |
| State and Nationwide Trial Jury Selection: | May 14, 2012 |
| State and Nationwide Trial: | May 21, 2012 |
| Trial for Attorneys General Actions for AR, FL, MO, MI, WV & WI: | November 5, 2012 |
| Trial for Attorneys General Actions for CA & NY: | Not Scheduled |

At this Fairness Hearing the Court will consider whether each of the Settlements is fair, reasonable and adequate, including any objections or comments that may be filed. After the hearing the Court will decide whether to approve each of the Settlements. We do not know how long these decisions will take. The Court will also consider the Motion for Reimbursement of Expenses at the Fairness Hearing.

No money is available for distribution right now. Click [here](#) to register to receive information on future developments including a claim form when one becomes available.

DISCLAIMER

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

EXHIBIT I

You are receiving this notice because you requested to be notified by email of developments in the LCD Indirect Purchaser Litigation and Settlements.

On March 14, 2012, Class Counsel and the States Attorneys General filed a Motion for Reimbursement of Expenses incurred in pursuing this case through the end of December 2011. The Motion is set for hearing by the court on May 18, 2012 at 9:00 a.m. Any objection to this Motion must be filed by April 13, 2012.

Copies of the documents relating to the Motion are available online for you to review at the Court Documents section of the website.

LCD Indirect Purchaser Litigation and Settlements Website: <https://lcdclass.com/Home.aspx>

Sincerely,

Notice Administrator
LCD Indirect Purchaser Litigation and Settlements
info@LCDClass.com
1-855-225-1886

EXHIBIT J

IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION
EXCLUSIONS

| Exclusion | Name | City | State |
|-----------|---|---------------------|-------|
| 1 | EASTMAN KODAK COMPANY | SAN FRANCISCO | CA |
| 2 | JUDITH A WHEELER | BOLTON | MA |
| 3 | CHARLES RECOTTA | IONE | CA |
| 4 | JAKE ENGLISH | HOUSTON | TX |
| 5 | TAMI PARKER | FULLERTON | CA |
| 6 | CIRCUIT CITY STORES | HOUSTON | TX |
| 7 | HOME DEPOT USA INC | ATLANTA | GA |
| 8 | D HIEP TRUONG | SOUTH SAN FRANCISCO | CA |
| 9 | JOSEPH R NEILAN | TONOPAH | AZ |
| 10 | SONY ELECTRONICS INC | SAN FRANCISCO | CA |
| 11 | SONY COMPUTER ENTERTAINMENT AMERICA LLC | SAN FRANCISCO | CA |

EXHIBIT K

IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION
OBJECTIONS

| Objection | Name | City | State |
|-----------|---|--------------------|----------|
| 1 | STEPHANIE LASKEY | HENDERSON | NV |
| 2 | IRA CONNER ERWIN | INDIAN ROCKS BEACH | FL |
| 3 | BILLY B WOOD | ALACHUA | FL |
| 4 | DERRICK HARRIS | LIVE OAK | FL |
| 5 | RUSSELL COBB | GAINESVILLE | FL |
| 6 | LUIS MARIO SANTANA | MIAMI | FL |
| 7 | GERI MAXWELL MARIA MARSHALL WAYNE MARSHALL GERRI MARSHALL | DOWNEY | CA |
| 8 | STEFAN REST | RINCON | PR |
| 9 | CHASE THOMPSON | PINSON | AL |
| 10 | SHANNON CASHION W CHRISTOPHER MCDONOUGH MARK SCHULTE KELLY KRESS | | MO |
| 11 | BARBARA COCHRAN KEVIN LUKE | OXNARD HONOLULU | CA HI |
| 12 | ROGER BARTNICK | OCALA | FL |
| 13 | ANDREA KANE | | IL |
| 14 | JULIUS N DUNMORE JR | GAINESVILLE | FL |
| 15 | ALISON PAUL JOHNNY KESSEL | ENCINITAS | CA |